UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE:)	
GENERAL MOTORS LLC)	
IGNITION SWITCH LITIGATION)	No. 14-MD-2543 (JMF)
)	No. 14-MC-2543 (JMF)
This Document Relates only to Sherry Ann)	, ,
Champagne, individually and as special administrator)	Hon. Jesse M. Furman
of the estate of Van Hugh Needham, Deceased)	
)	
Case No: 1:18-cv-08922		

MOTION FOR ORDER PERMITTING SUBMISSION OF MEMORANDUM AND DECLARATION IN SUPPORT OF MOTION TO WITHDRAW UNDER SEAL AND IN CAMERA

Langdon & Emison, LLC (hereinafter the "Firm") respectfully requests an Order permitting the Firm to file their Memorandum in Support of the Firm's Motion to Withdraw as Counsel and Declaration in Support of the Firm's Motion to Withdraw as Counsel, under seal and *in camera*. Because the Memorandum in Support of the Firm's Motion to Withdraw as Counsel and the Declaration reflect confidential information pursuant to New York Rule of Professional Conduct 1.6(a), the Firm respectfully requests that the Court permit the Firm to submit both the Memorandum and the Declaration under seal and *in camera* (that is, to file both documents under seal and submit both documents to the Court by email without disclosure to any other parties). The Firm has filed a Memorandum in Support of this Motion and has submitted the Declaration and Memorandum in Support of the Firm's Motion to Withdraw by email in accordance with Your Honor's Individual Rules and Practices.

Request GRANTED. The Clerk of Court is directed to docket this in 14-MD-2543 and 18-CV-8922. The Clerk of Court is further directed to terminate 14-MD-2543, ECF No. 7604 and 18-CV-8922, ECF No. 31. SQ ORDERED.

Dated: December 11, 2019 Respectfully submitted,

/s/ Brett A. Emison

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Attorney for Plaintiff